



1100 13th Street NW, Third Floor
Washington, DC 20005

phone 202.955.3500
fax 202.955.3599
www.ncqa.org

December 11, 2020

The Honorable Donald Rucker, M.D.
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C Street SW, 7th Floor
Washington, D.C. 20201

Dear National Coordinator Rucker:

The National Committee for Quality Assurance (NCQA) urges you to include the Gravity Project approach to adding structured social determinants of health (SDOH) data to the U.S. Core Data for Interoperability (USCDI) so that it can be in the draft version 2 up for public comment this January. It is critically important to add SDOH to the USCDI so that we can incorporate SDOH more broadly in quality measurement and improvement throughout our health care system.

The COVID-19 pandemic's harsh racial and ethnic disparities and mass protests over racial injustice have caused a national reckoning on the urgent need to advance health equity and eliminate disparities that have long plagued our health care system. SDOH determine up to 80% of health status at a population level, yet there is still no consistent way to document and communicate these factors in electronic data exchange during a health care encounter .

Establishing a national structured SDOH data standard is essential for our ability to better identify, track and address SDOH as we move towards **digital quality measurement** (dQM) and increasingly sophisticated value-based programs (VBP) that feature shared risk and a focus on population health. It has potential it improve the quality and completeness of SDOH data. Ensuring a consistent way for doing this also will reduce the burden on providers and community partners.

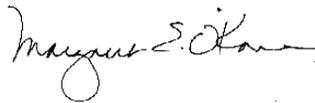
The Gravity Project is a nationwide multi-stakeholder collaborative working to build consensus data elements, standards, and HL7 FHIR specifications for SDOH data capture, exchange, use, and aggregation. This fall, the Project submitted a new SDOH data class with eleven initial domains across key clinical activities integrating four leading code systems. ONC has already categorized the Gravity Project's submission as Level 2. This indicates that:

- You have agreed that the SDOH data elements demonstrate extensive existing use and exchange between health systems,
- That use cases show significant value to current and potential users and to nationwide interoperability, and
- That any burdens or challenges would be reasonable to overcome relative to the overall impact of the data elements.

Given this, NCQA argues strongly for including the Gravity Project's proposal in what you release for public comment next month. We thank you for your close attention to this priority and look forward to seeing this strong approach to SDOH structured data becoming our national standard.

Thank you for the opportunity to comment. If you have any questions please contact Paul Cotton, Director of Federal Affairs, at (202) 955-5162 or cotton@ncqa.org.

Sincerely,



Margaret E. O'Kane
President